HOMEWOOD HIGH AND DRY MARINA

STORM WATER POLLUTION PREVENTION PLAN

The Homewood High and Dry Marina's (HHDM) SWPPP is designed to comply with Federal requirements to implement best management practices (BMP's) to achieve compliance with effluent limits and receiving water objectives. HHDM will identify and evaluate sources of pollutants associated with industrial activities being conducted at the facility that may affect the quality of storm water discharges and prevent non-storm water discharges from the facility; and will identify and implement site-specific BMP's to reduce or prevent pollutants associated with industrial activities in storm water discharges and non-storm water discharges.

HHDM's SWPPP is a written document what will contain a compliance activity schedule, a description of industrial activities and pollutant sources, descriptions of BMP's, a site plan, and relevant copies or references of parts of other plans. A copy of any requirements incorporated by reference will be kept at the facility. The SWPPP will be revised whenever appropriate and will be readily available for review by facility employees or Regional Board inspectors.

Planning and Organization

The HHDM's owner, manager, and assistant manager will work as a team to review, update, and implement plans and procedures as specified in the General Permit. HHDM will conduct all monitoring and reporting program activities required by the General Permit. HHDM has instituted a plan to control spills of hazardous materials.

Site Plan

HHDM's site plan includes notes, legends, and other data as appropriate. Legend description as follows:

- 1. Oil/water/sand separator (O/W/S) To filter oils and contaminants.
- 2. Fawn Street Storm drain operated by Cal Trans.
- 3. Apron Concrete pad.
- 4. DI Bldg. Drain inlet inside marina building (closed off).
- 5. Boat Wash Boat cleaning area.
- 6. Steam Clean Lifts Infiltration area.
- 7. Fuel Dock Public fueling area.
- 8. Fuel Bay 1 Customer fueling area.

List of Significant Materials

On the north side of marina building (outside) there are two 6,000 gallons above ground Convault Fuel Tanks, which are double wall, steel and concrete lined. Adjacent to these tanks are two 55 gallon containers of waste oil and waste fuel in a covered container that is designed to contain a spill of 110% of the fluids. Located on the northeast corner of the marina building (outside) is one 500 gallon diesel fuel tank, which is covered and in a container designed to contain a spill of 110% of the fluids.

Located on the bottom floor, west end of marina building is the Service Department Shop. It may contain quart containers of lubes and oils, two 5 gallon containers of lubes, aerosol spray cans of paints, lubes, and starter fluids and a 20 gallon solvent tank. Adjacent to the Service Department Shop is the Parts room, which may also contain quart containers of lubes, oils, and aerosol cans. Located on the inside northeast corner of the marina building (rack area 18A) is stored 5 gallon lube containers, misc. quarts of lubes and oils, and two 55 gallon drums of 30W oil on containment pallets. On the inside southeast corner (rack area 1A) is stored misc. 1 to 5 gallon paint containers, misc. spray cans and quarts of paint, misc. quart and 5 gallon containers of oils and hydraulic fluids, and misc. gallon and spray bottles of cleaning fluids.

Description of Potential Pollutant Sources

HHDM stores, launches, fuels, washes, and repairs small power boats ranging in size from 16' to 33'. Our main launching activities are done by forklift launched directly into the harbor. Forklifts are steam cleaned periodically to help prevent pollution into the harbor. We fuel boats in the harbor and gas dock areas. Employees are instructed not to over fill boats, the auto lock on devices are removed from the nozzles and absorbent towels are wrapped around the nozzles to prevent spills. Employees are instructed on the use of booms in case of a fuel spill. We wash boats with a minimum of biodegradable soaps and water which flows into the O/W/S separator. Our mechanical repairs are done mostly inside our shop in an enclosed environment. Small repairs are done outside in the racks. Sometimes boats (not being lake tested) are run in the racks temporarily using a garden hose for circulating water. This water runs onto the lawn or over pavement to the O/W/S separator. Mechanics are instructed to use absorbent pads or pillows to keep the bilges clean. Also these "absorbent pillows" are available to our customers.

All 55 gallon drums and waste oil/fuel drums are kept on containment pallets with at least 110% containment. The diesel tank is enclosed with over 110% containment. The fuel tanks are newer Convault tanks with 110% containment and lined with steel and concrete. Fuel supply lines are newer double walled lines for containment. Any oil sheens noticed are immediately contained using absorbent pillows/booms or pads. A final clean up is done with "oil-sorb" powder to enable dry sweeping of the area.

In order to minimize dust we do not allow fiberglass repairs at our facility. Minimal cutting or sanding is done and usually inside the shop, therefore minimal dust is created at the facility. We sweep the driveway and along the roadside at least annually in the Spring (soon after the snow melts) and as necessary throughout the operating season. We sweep the inside of the warehouse and around storage area when necessary.

HHDM has experienced minor fuel spills (less than 5 gallons) in the harbor that were contained with booms, then "mopped up" with absorbent diapers. We have had minor hydraulic leaks

from the forklift that we cleaned up with absorbent pads and then swept with "oil-sorb" powder.

To eliminate or reduce to the extent practicable the discharge of materials other than storm water to the storm sewer and/or receiving water we have closed off our D.I. inside the marina warehouse. Outside we wash boats using a minimal amount of biodegradable soaps and water. Also we run boat engines using water from a hose as cooling circulation water. Both eventually drain into our O/W/S separator. We are currently redesigning the O/W/S separator to pump it away from the harbor.

HHDM has minimal soil erosion occurring as a result of industrial activity. All dirt areas are surrounded by pavement or infiltration trenches. We are currently working with TRPA to design and install planter boxes and additional infiltration trenches. The O/W/S separator contains the onsite runoff from impervious surfaces generated from up to and including a 20-year, 1 hour storm which would drop approximately 1 inch of rain in the California portion of the Lake Tahoe Basin. We are currently engineering a pump to drain the O/W/S separator away from the harbor and are re-designing our apron on the harbor border (west side) to drain properly.

HHDM regularly inspects and maintains the O/W/S separator to ensure proper operation. Our maintenance includes professionally pumping out of the O/W/S separator twice annually, and inspect and change the absorbent pillows monthly during the operating season. All HHDM employees are instructed on good housekeeping procedures and the proper use of absorbent booms, diapers, oil-sorb for spill clean up procedures based upon the quantities and locations of significant materials that may spill or leak. Material handling and storage is included in the instruction to minimize exposure to storm water and authorized non-storm water discharges.

Employee Training

HHDM is training personnel who will be responsible for (1) implementing activities identified in the SWPPP, (2) conducting inspections, sampling, and visual observations, and (3) managing storm water. The manager and/or assistant manager visually inspects all areas designated on

site plan daily for pollutants and/or discharges. He trains new hire employees when hired and conducts monthly training sessions.

Waste Handling/Recycling

HHDM contains all waste oil/gas in 55 gallon drums that are covered and on containment pallets. All wastes are removed from the site for disposal by a licensed and regulated disposal company in compliance with Federal, State and Local laws, regulations, and ordinances.

Record Keeping and Internal Reporting

HHDM is developing a system whereby all records of inspections, spills, maintenance activities, corrective actions, visual observations, etc., are retained, and provided, as necessary, to the appropriate facility personnel. Tracking and follow-up procedures will be designed to ensure adequate corrective actions are taken and SWPPPs are updated accordingly.

Control Devices

All employees have been trained on locations of emergency shut off devices in case of fuel leaks.

Annual Comprehensive Site Compliance Evaluation

HHDM will conduct one comprehensive site compliance evaluation in each reporting period (Nov 1 - Oct 31). Evaluations shall be conducted within 8-16 months of each other. The SWPPP will be revised, as appropriate, and the revisions implemented within 90 days of the evaluation. Evaluations will include the following:

- a. A review of all visual observations records, inspection records, and sampling and analysis results.
- A visual inspection of all potential pollutant sources for evidence of, or the potential for, pollutants entering the drainage system.
- c. A review and evaluation of all BMP's (both structural and non-structural) to determine whether the BMP's are adequate and properly implemented and maintained, or whether additional BMP's are needed. A visual inspection of

- equipment needed to implement the SWPPP, such as spill response equipment shall be included.
- d. An evaluation report that includes, (i) identification of personnel performing the evaluation, (ii) the date (s) of the evaluation, (iii) necessary SWPPP revisions, (iv) a schedule for implementing SWPPP revisions, (v) any incidents of non-compliance and the corrective actions taken, and (vi) a certification that the facility operator is in compliance with this General Permit. The evaluation report shall be submitted as part of the Annual Report, retained for at least 5 years, and signed and certified in accordance with Standard Provisions.

SWPPP General Requirements

- a. The SWPPP will be retained on site and made available upon request of a representative of the Regional Board.
- b. The SWPPP will identify the existing storm water BMP's already in place at the marina and new BMP's that are needed at the marina in order to further reduce and prevent pollutants in storm water and non-storm water discharges. The new BMP's that are identified by the marina operation in the SWPPP will be implemented by October 15, 2003.
- c. The Regional Board may notify the facility operator when the SWPPP does not meet one or more of the minimum requirements of this section. As requested by the Regional Board the facility operator will submit a SWPPP revision and implementation schedule that meets the minimum requirements of this section to the Regional Board. Within 14 days after implementing the required SWPPP revisions, the facility operator will provide written certification to the Regional Board that the revisions have been implemented.
- d. The SWPPP will be revised as appropriate, and implemented prior to changes in industrial activities which (i) may significantly increase the quantities of pollutants in storm water discharge, (ii) cause a new area of industrial activity at the facility to be exposed to storm water, or (iii) begin an industrial activity which

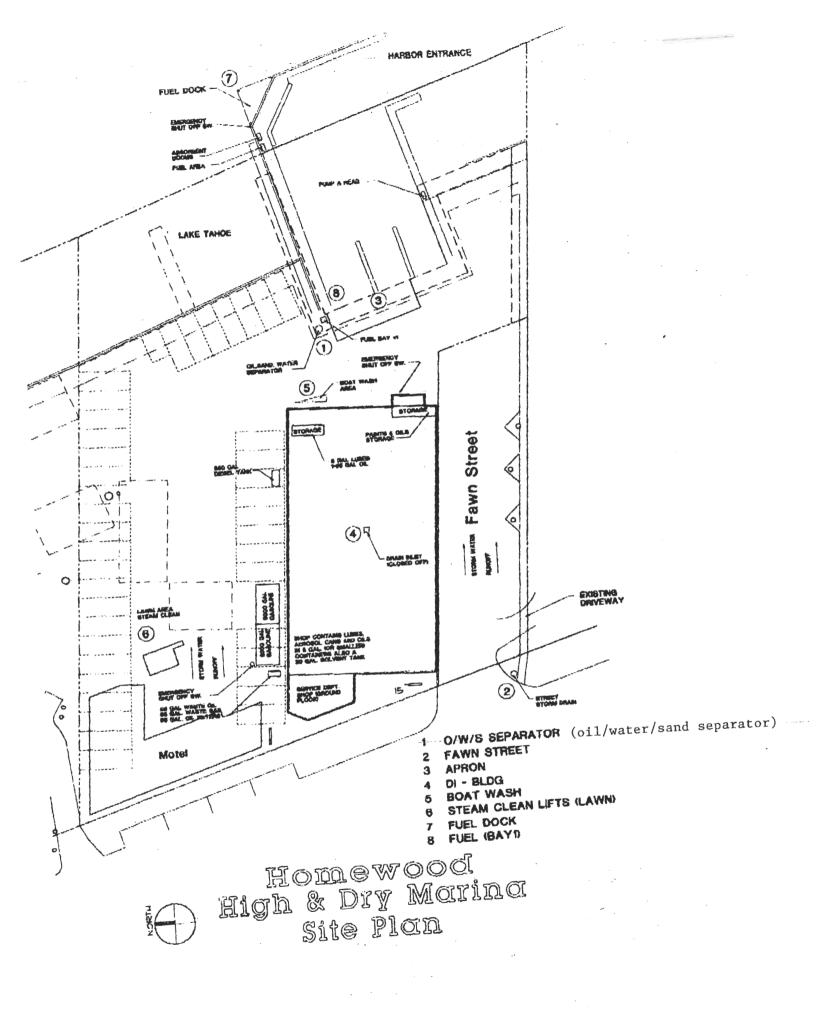
- would introduce a new pollutant source at the facility.
- e. The SWPPP will also be amended if it is in violation of any condition of this General Permit, or has not achieved the general objectives of controlling pollutants in storm water discharges. The amended SWPPP will be submitted no later than 30 days after the determination of violation or non-achievement to the Regional Board Executive Officer for review and approval.

Public Access

The SWPPP is a report that will be available to the public under Section 308 (b) of the CWA. HHDM will make available for review a copy of the SWPPP directly to requestor.

Preparer

The SWPPP will include the signature and title of the person responsible for preparation of the SWPPP, the date of initial preparation, and the person and date for each amendment thereto.



HOMEWOOD HIGH & DRY MARINA

FUEL SYSTEM MANAGEMENT PLAN SPILL PREVENTION AND RESPONSE PLAN

2004

There were no incidences of leaking hoses during the 2004 season. We replaced two dispenser hoses.

1. FUEL DISPENSING

All fuel hoses and nozzles are checked visually on a daily bases when in use. In addition, the hoses and connections are tested manually weekly.

HOSES

Hoses are replaced when necessary with new hoses.

NOZZLES

When leaking or dysfunctional nozzles are detected the system is shut down and the faulty nozzle replaced as soon as possible. We stock several new spare nozzles for replacement. If you use one, notify manager to order another replacement.

EMPLOYEE TRAINING

Homewood Marina employees are trained to be present at all times while fueling. The nozzle is given to the customer along with a shop towel to cover the nozzle and filler. Instruction is given not to overfill the gas tank and to watch the fuel gage at all times. The lever locks have been removed from the nozzles.

VEHICLE MAINTENANCE

All vehicle maintenance is done by qualified personnel on an impervious surface using drain pans, shop towels, and absorbents.

2. SPILL PREVENTION

DAILY VISUAL INSPECTION

Marina employees perform a daily visual walk through inspection of hoses/fittings/nozzles. They are instructed to look for any sheens, leaks or drips. Employees are present at all times while fueling. Dispensers are padlocked when not in use. Power is shut off at the breaker box each night. There are three emergency shut offs. One at the gas dock, on front outside of office and at the fuel tanks. Shut off switches are clearly marked and highlighted by red paint.

ABOVE GROUND FUEL TANKS

There are two Convault tanks with secondary containment and encapsulized with concrete which are padlocked at all times. Return vent lines are installed to prevent noxious fumes from escaping while filling the tanks. Overflow containment at the fill lines. The tank is equipped with ninety percent (90%) guillotine auto shut offs to guard against overflow, and the fuel supply lines have secondary containment in place. Operator is always present during filling of our fuel tanks.

3. WASTE DISPOSAL

RENO DRAIN OIL

Homewood Marina contracts with Reno Drain Oil for waste disposal.

The waste oil is stored in a 55 gallon drum, enclosed in a vault with 110% containment. Spare waste oil is stored in a covered 55 gallon drum with 110% containment.

The waste gas is stored in a 55 gallon drum in an enclosed vault with 110% containment.

Used booms/pillows/pads are stored covered in a closed/sealed 55 gallon drum.

Used oil filters are stored covered in a closed 55 gallon drum.

Contaminated absorbents are stored in covered closed garbage cans.

All containers are clearly marked.

Sand/Oil/Water Separator - The S/O/W Separator is drained and cleaned each spring and fall by Reno Drain Oil. Absorbent pillows are removed and replaced monthly while marina is open.

4. RESPONSE/CLEANUP

Emergency numbers are posted for the following:

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Coast Guard	583-4433
CA Regional Water Quality Control - Lahontan Region	on 542-5400 or
Mary Fiore-Wagner	542-5425
Placer County Environmental Health - John Reid	581-6240
Office of Emergency Services - Sacramento 8	00- 852-7550
TRPA 7	75- 588-4547
Reno Drain Oil (if needed) 7	75- 342-0351

SPILL KITS

There are four spill kits located strategically at the marina.

2 located at the gas dock

1 located at the waste area

1 located at the oils area

CLEAN UP

All minor leaks and/or drips of fluids on pavement are cleaned up with shop towels and absorbents.

Any leaks or fluids on pavement that would drain downhill would be contained with booms, pillows, or diapers.

Any spills near the S/O/W Separator are immediately contained and diverted away from entering the S/O/W Separator and cleaned up.

Spills in the harbor, harbor area are cordoned off, sprayed with Petro Clean and cleaned up by using booms, pillows and diapers.

Major spills in harbor, harbor area is cordoned off with booms and shut down. Reno Drain Oil and/or Coast Guard will be called to clean spill if necessary.

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HOMEWOOD HIGH AND DRY MARINA

MONITORING PROGRAM AND REPORTING 6-00-36 NPDES CAG616003

FOR

NATIONAL POLLUTANT DISCHARGE ELIMINATION SYSTEM GENERAL PERMIT

FOR

DISCHARGES OF STORM WATER RUNOFF ASSOCIATED WITH INDUSTRIAL ACTIVITY AND MAINTENANCE DREDGING AT MARINAS

Homewood High and Dry Marina (HHDM) has submitted a Notice of Intent (NOI) pursuant to State Water Resources Control Board (SWRCB) Order No 91-013-DWQ, and will continue to implement the monitoring program.

HHDM will ensure that storm water discharges, non-storm water discharges, and discharges associated with maintenance dredging are in compliance with the Discharge Prohibitions, Effluent Limitations, and Receiving Water Limitations.

HHDM will ensure practices at the marina will reduce or prevent pollutants in surface water discharges, storm water discharges, and non-storm water discharges are evaluated and revised to meet changing conditions.

HHDM will aid in the implementation and revision of the SWPPP.

HHDM will measure the effectiveness of BMP's to prevent and reduce pollutants in storm water discharges.

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Information for the monitoring program will be found in the SWPPP. HHDM's site specific monitoring program will be revised whenever appropriate, and will be readily available for review by employees or Lahontan Regional Board inspectors.

Non-Storm Water Discharge Visual Observations

HHDM operators will visually observe all drainage areas within their facilities for the presence of unauthorized non-storm water discharges on a monthly basis, during daylight hours, on days with no storm-water discharges and during scheduled marina operating hours during each month the marina is operating. Visual observations will document the presence of any discolorations, stains, odors, floating materials, etc. and the source of any discharge. Records will be maintained of the dates, locations observed, and the response taken to eliminate unauthorized non-storm water discharges and to reduce or prevent pollutants from contacting non-storm water discharges.

Storm Water Discharge Visual Observations

HHDM operators will visually observe storm water discharges from four events per operating season of the marina. These visual observations will occur during the first hour of discharge and at all discharge locations. Visual observations of stored or contained storm water will occur at the time of release. Visual observations are only required of storm water discharges that occur during daylight hours that are preceded by at least three working days without storm water discharges and that occur during scheduled operating hours. Visual observations will document the presence of any floating and suspended material, oil and grease, discolorations, turbidity, odor, and source of any pollutants. Records will be maintained of dates, locations, observations, and response taken to reduce or prevent pollutants in storm water discharges.

Storm Water and Surface Water Sampling and Analysis

HHDM operators will collect storm water samples during the first hour of discharge from the first storm event during the Marina's operating season, and at least one other storm event during the Marina's operating season at all storm water discharge locations. Sampling of storm or

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contained storm water shall occur at the time the storm water is released. Should samples from the first storm event during the operating season not be taken HHDM will still be required to collect samples from two other storm events during the Marina's operating season and shall explain in the Annual Report why the first storm event was not sampled. Sample collection is only required of storm water discharges that occur during scheduled marina operating hours and that are preceded by at least three working days without storm water discharge. Samples will be analyzed for Turbidity, pH, specific conductance, total phosphorus (reporting limit for total phosphorus shall be 0.008 mg/L as total P), and total nitrogen (reporting limit for total nitrogen shall be 0.15 mg/L), or other parameters as required by the Regional Board.

HHDM will collect a surface sample from the lake at the end of the fuel dock on July 4th and Labor Day. The sample will be analyzed for Benzene, toluene, ethyl benzene, total xylenes, and fuel oxygenates including MTBE, TBA, TAME, DIPE, and ETBE. If these pollutants are not detected in significant quantities after four sampling events, HHDM may eliminate the pollutant from future sample analysis or until the pollutant is likely to be present again.

Storm Water Discharge Locations

HHDM will visually observe and collect samples of storm water discharges from all drainage areas that represent the quality and quantity of the marina's storm water discharges from the storm event. If the marina's storm water discharges are commingled with run-on from surrounding areas, the marina operator will identify other visual observation and sample collection locations that have not been commingled by run-on and that represent the quality and quantity of the marina's storm water discharges from the storm event. HHDM may also choose to collect a sample up gradient of the marina influence and then down gradient of the marina prior to discharge.

Visual Observation and Sample Collection Exceptions

HHDM is not required to collect a sample and conduct visual observations due to dangerous weather conditions. If HHDM does not collect the required samples or visual observations

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during a wet season due to these exceptions HHDM shall include an explanation in the Annual Report why the sampling or visual observations could not be conducted. HHDM may conduct visual observations and sample collection more that one hour after discharge begins if the marina operator determines that the objectives of the Annual Report will be better satisfied, and he will include an explanation in the Annual Report.

Monitoring Methods

HHDM operators will visually observe and document storm water and non-storm water discharges at the eight locations specified in the attached site plan using the methods and frequency specified above and in the SWPPP. Water samples will be collect in a sterile container and analyzed by qualified laboratory. The lab report will identity the analytical methods and corresponding method of detection limits used to detect pollutants. This will include justification that the method detection limits are adequate to satisfy the objectives of the monitoring program.

Annual Report

HHDM operators will submit an Annual Report by November 15th of each year to the Executive Officer of the Regional Board. The report will include a summary of visual observations, sampling and analysis results (including laboratory reports), the Annual Comprehensive Site Compliance Evaluation Report required by the SWPPP. The Annual Report will be signed and dated by the operator.

Records

HHDM will maintain records of all storm water monitoring information and copies of all reports required by this General Permit will be retained for a period of at least five years as specified above.

Maintenance Dredging Sampling

HHDM will, prior to the start of dredging, obtain permits and collect proper water sampling

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specific to conditions to satisfy site permit. HHDM will comply with all other parameters specific to the permit and "General Provisions for Monitoring and Reporting" dated September 1, 1994

GENERAL INFORMATION A. Facility WOID Number: 6A318901010 B. Facility Operator. Nathan L. Topol Contact Person: Mark Kubinski Chief Financial Officer Title: Mailing Address: 6155 Plumas Street Reno, NV Zip: 89509 City/State: Phone: __775-829-5090 775-829-5066 Fax: Off-season Mailing Address: Same as above City/State: C. Marina Information Homewood High and Dry Marina Marina Name: Mailing Address: P.O. Box 1735 Tahoe City, CA 96145 City/State: _ Phone: __530=525=5966 96145____ Number of slips:____ Number of buoys: 125

Standard Industrial Classification (SIC) Code (s): 4493-Marina

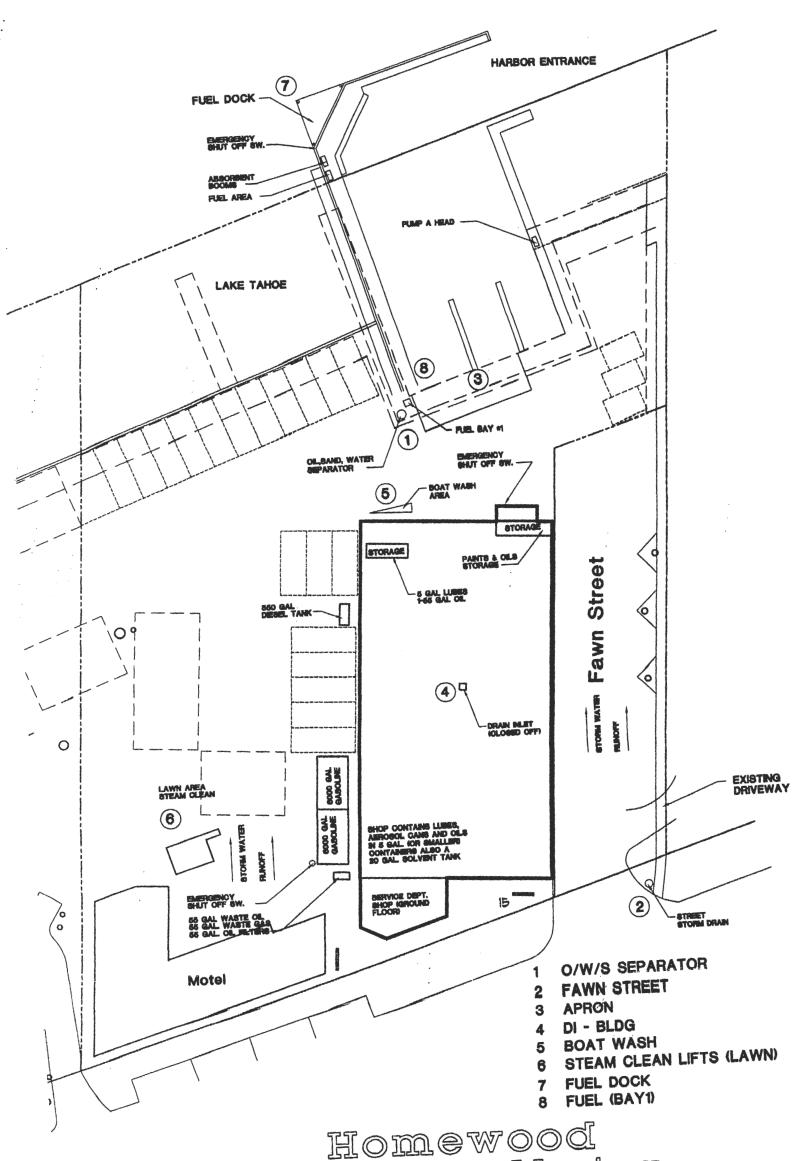
CERTIFICATION

"I certify under penalty of law that this document and all attachments were prepared under my direction or supervision in accordance with a system designed to assure that qualified personnel properly gather and evaluate the information submitted. Based on my inquiry of the person or persons who manage the system, or those persons directly responsible for gathering information, the information submitted, is, to the best of my knowledge and belief, true, accurate, and complete. I am aware that there are significant penalties for submitting false information, including the possibility of fine and imprisonment for knowing violations."

Signature

MATHAN L. TOPOL

Date



Homewood High & Dry Marina Site Plan